REMARKS

Responsive to the Office Action mailed October 3, 2006, Applicants provide the following. Claims 9 and 24-54 were previously canceled. Therefore, Twenty Nine (29) claims remain pending in the application: Claims 1-8, 10-23, and 55-61. Reconsideration of claims 1-8, 10-23, and 55-61 in view of the amendments above and remarks below is respectfully requested.

By way of this amendment, Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain any outstanding issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned at (858) 552-1311 so that such issues may be resolved as expeditiously as possible.

Claim Rejections – 35 U.S.C. §101

1.   Claims 56-61 stand rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. Applicants respectfully traverse these rejections. The rejections specifically state that "the claim does not define any structural and functional interrelationships between a computer program and other claimed elements of a computer..." (office action, page 2). Applicants respectfully submit that 35 U.S.C. §101 does not require structural or functional interrelationship with a computer. Further, the United States Supreme Court has held and MPEP Section 2106(IV)(A) states, that "Congress chose the expansive language of 35 U.S.C. 101 so as to include 'anything under the sun that is made by man'" (MPEP 2106, citing Diamond v. Chakrabarty, 447 U.S. 303, 308-09, 206 USPQ 193, 197 (1980). Further, claims 56-61 recite a tangible medium storing computer readable code that itself at least is a useful and concrete result. MPEP Section 2106 further states in describing patentable subject matter that "[t]he claimed invention as a whole must accomplish a practical application. That is, it must produce a 'useful, concrete and tangible result'" (MPEP 2106, citing State Street, 149 F.3d at 1373, 47 USPQ2d at 1601-02). Claims 56-61 are directed to a software system

stored on tangible computer readable medium that in itself is a useful, concrete and tangible result that has real world value and is not just an idea or a concept but is tangible, useful and concrete. Therefore, Applicants submit that claims 56-61 are directed to patentable subject matter, and Applicants respectfully request the rejection be withdrawn.

Claim Rejections - 35 U.S.C. §102

2.   Claims 1-3, 6, 8, 10-23 and 55-61 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,580,870 to Kanazawa et al. Applicants respectfully traverse these rejections in that the Kanazawa patent fails to teach all of the elements as recited in at least claims 2-8 and 12-14, 16 and 21.

For example, claim 2 recites in part "accessing content recorded onto a recording medium by calling one of a plurality of directories, the directory being suitable for use with a platform of the client device." Applicants respectfully submit that the Kanazawa patent does not teach or suggest at least directories on the recoding medium or that the directories are suitable for use with a platform of the client device. The office action attempts to support the rejection of claim 2 by citing column 16 lines 1-17, and column 12, lines 43 through column 13, line 24 of the Kanazawa patent. The Kanazawa patent does not teach or suggest directories and further columns 12, 13 and 16 do not teach or suggest at least directories as recited in claim 2. More specifically, column 16 of the Kanazawa patent recites in describing FIG. 18 that:

> a video object is composed of a file group for video objects ... management information on the data, and a control information file group ... The video object is an MPEG-2 program stream and has PCI and DSI, video data management information ... A navigation pack including these is called a video object unit ... embedding a URL in the reserve area for the PCI or DSI makes it possible to specify the Internet address ... The following is an explanation of playback when the data is embedded. When the Web button is pressed during the playback of the DVD video, the related HTML contents are displayed in the sequence shown in the flowchart of FIG. 20.

There is no discussion or suggestion of directories or a directory being suitable for use with a platform of the client device. Similarly, column 12, line 43 through column 13, line 24 also fails to describe directories. Instead, column 12 lines 43-48 in describing FIG. 18 recites in part:

> the volume space of a DVD-ROM medium is composed of a volume film structure for managing volumes and files, a DVD video zone constituting DVD video information, and an area for files other than DVD video."

There is no discussion or suggestion of a plurality of directories as recited in claim 2. Therefore, claim 2 is not anticipated by the Kanazawa patent.

Claims 3-8 depend from claim 2. Therefore, claims 3-8 are also not anticipated by the Kanazawa patent. Further, with regard to at least claim 3, the Kanazawa patent does not teach at least that the directories include additional HTML content as recited. In rejecting claim 3, the office action cites column 11, lines 53-58 and column 16, lines 21-23. However, as demonstrated above, columns 11 and 16 do not describe or suggest directories, and further do not teach or suggest directories including additional HTML content. Therefore, claim 3 is not anticipated by the Kanazawa patents. Similar arguments can be presented for at least claims 4-5 and 7.

With regard to at least claim 6, the Kanazawa patent fails to teach or suggest at least directories containing "platform specific code segments." There is no discussion or suggestion in the Kanazawa patent regarding platform specific code segments. The office action in rejecting claim 6 cites the elements in Figure 4 identified with reference numbers 30 and 40b of the Kanazawa patent (office action, page 3). The element identified with reference numerals 30 and 40b, however, are describe as "access information (or link information) 30" (col. 5, lines 16-17) and "information management table 40b" (col. 4, line 37). Nowhere in the Kanazawa patent is it suggested that elements 30 and 40b are directories or that they contain "platform specific code segments" as recited in claim 6. Therefore, at least claim 6 is not anticipated by the Kanazawa patent.

Further regarding at least claim 8, the Kanazawa patent also fails to teach or suggest at least directories containing additional HTML content that is "provided via a portable storage medium" as recited in claim 8. The office action in rejecting claim 8 cites column 11, lines 25-34 and 55-61, column 12, lines 43-46 and column 16 lines 18-24 of the Kanazawa patent (see office action, page 3). However, these portions of the Kanazawa patent do not teach directories or directories containing additional HTML content that is provided via a portable storage medium. Therefore, claim 8 is also not anticipated by the Kanazawa patent.

The Kanazawa patent also fails to teach or suggest all of the elements as recited in at least claim 12. For example, claim 12 recites in part that "the HTML content is in the form of textual script, which scrolls with the media content." The Kanazawa patent may describe HTML content that is textual, however, nowhere does the Kanazawa patent suggest that the textual script scrolls with the media content. In rejecting claim 12, the office action cites Figures 10C, 11B and 19A-19B. Figure 10C, however, does not teach or suggest textual HTML content or textual content that scrolls with the media content. Figure 11B of the Kanazawa patent only shows that an HTML page is displayed in a separate window from the window 95 showing the scene 94. There is no teaching that the HTML page 96 is textual or that it scrolls with the content. Similarly, Figures 19A-19B show HTML data that is displayed in a separate window than the DVD video. There is no teaching or suggestion that the HTML data scrolls with the media content. The office action fails to provide further support other than Figures 10C, 11B and 19A-B. Applicants respectfully submit that the Kanazawa patent does not teach or suggest text that scrolls with the playback of the media content. Further in describing Figures 19A-B and the process of Figure 20 associated with Figures 19A-B the Kanazawa patent describes "[i]f an Internet address (URL) is included, the DVD playback control program 116 will store the position and state of the DVD video presently being reproduced and go into the pause (or halt) state (steps S104, S105)" (Kanazawa, col. 16, lines 25-28, emphasis added). Thus, the Kanazawa patent does not teach or suggest that textual

HTML content scrolls with the media content, and instead teaches away from scrolling in that the media content is halted while the HTML content is displayed. Therefore, the Kanazawa patent fails to teach each limitation as recited in at least claim 12, and thus, claim 12 is not anticipated by the Kanazawa patent.

Claim 13 similarly recites that the HTML content scrolls with the media content. As demonstrated above, the Kanazawa patent does not teach HTML content that scrolls and instead states that the media content is halted. Further, claim 13 recites in part that the HTML content "scrolls synchronously with the media content" and still further recites that "selecting a portion of the HTML content navigations the user to a corresponding location in the media content." There is no discussion or suggestion in the Kanazawa patent to provide HTML content that when selected navigates the user to a corresponding location in the media content. The office action cites column 15, lines 34-64, column 20, lines 20-23, and column 11 lines 48-55 and 25-39. Lines 34-65 of column 15 of the Kanazawa patent, however, only describes that the HTML and DVD playback are "displayed simultaneously" (col. 15, lines 36-37) or that in response to a user selecting to access HTML content the playback is suspended S105 and then HTML content is retrieved to be displayed in a separate window (see FIG. 20) "interlocking" HTML content on the display. There is no suggestion or discussion that selecting a portion of the HTML content navigates a user to a corresponding location in the media content as claimed. Further, the "interlocking" described in the Kanazawa patent is only described as displaying the HTML content while the halted media content is still displayed. There is no discussion that the "interlocking" allows a user to select a portion of the HTML content that will navigate a user to a corresponding location in the media content. Therefore, claim 13 is also not anticipated by the Kanazawa patent.

Claim 14 is also not anticipated by the Kanazawa patent. For example, claim 14 recites that HTML content includes "an HTML page that starts a movie and checks for related internet sites." The Kanazawa patent fails to teach or suggest HTML page that starts a movie, and further fails to suggest HTML content that checks for related

internet sites. Instead, the Kanazawa patent describes accessing HTML content upon user activation (e.g., "only when the user selects the Web button" (col. 15, line 52)). Further, in rejecting claim 14 the office action cites column 11, lines 48-61 and column 15, lines 50-60. Column 11, lines 48-61 of the Kanazawa patent, however, states "when the user has given an instruction to display HTML contents ...browser 117 acquires the HTML contents specified by the URL and displays it together with the moving picture on the screen." There is no discussion or suggestion that HTML content start a movie, or HTML content that checks for related internet sites. Instead, only after a user selects a URL does the browser search for that URL to retrieve the associated HTML content. Similarly in column 15, lines 50-60, only after the user selects to access Internet content does the system use the URL to acquire HTML content. There is no discussion that the HTML content starts a movie or that the HTML content searches for related internet sites. Thus, the Kanazawa patent fails to teach each limitation as recited in claim 14, and claim 14 is not anticipated by the Kanazawa patent.

Additionally, at least claim 21 is not anticipated by the Kanazawa patent in that the Kanazawa patent fails to teach at least "selection of a portion of the textual script navigates the multimedia content to a corresponding location in the multimedia content" as recited in claim 21. As demonstrated above with respect to at least claim 13, the Kanazawa patent does not teach or suggest the selection of textual script that navigates to multimedia content. The Kanazawa patent only describes allowing a user to activate internet access to retrieve content associated with a URL. There is no discussion or suggestion that textual script navigates to multimedia content. Therefore, claim 21 is not anticipated by the Kanazawa patent.

Claim 59 includes language similar to that of claim 2. For example, claim 59 recites in part "multimedia content and the HTML content are stored in multiple directories". As demonstrated above, the Kanazawa patent fails to teach or suggest multiple directors or HTML content being incorporated into multiple directories. Therefore, claim 59 is also not anticipated by the Kanazawa patent.
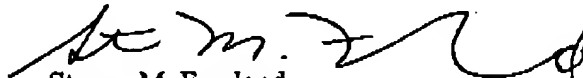
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Amendment C

CONCLUSION

Applicants submit that the above remarks demonstrate that the pending

claims are not anticipated by the applied reference. Therefore, Applicants request the

rejections be withdrawn.

Respectfully submitted,

Dated: /2-4-06

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